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August 30, 2022

VIA ECF

United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: ***Eliyahu Aranias v. SMG Automotive Holdings LLC d/b/a
Brooklyn Chrysler Jeep Dodge Ram et al.***
Case No. 1:22-cv-04510-BMC

Dear Judge Cogan:

This firm represents Defendants SMG Automotive Holdings LLC d/b/a Brooklyn Chrysler Jeep Dodge Ram and Zacahary [SIC] Schwebel (collectively “Brooklyn Chrysler”) in this matter. Brooklyn Chrysler respectfully requests a 30-day extension of time to answer, move, or otherwise respond to Plaintiff’s Amended Complaint.

Defendant’s original deadline to answer was September 5, 2022. With a 30-day extension, the new deadline would be October 5, 2022. There have been no previous requests for an adjournment in this matter.

Counsel for Plaintiff has consented to adjourning Defendant’s time to answer, the scheduled joint letter, case management plan, and initial conference to the following month. With an extension, the joint letter would be moved to October 6, 2022, case management plan to October 9, 2022, and initial conference to either October 12, 14, 17, 19, 20, or 21 of 2022.

Defendant requests this extension to allow sufficient time to investigate Plaintiff’s allegations, contact Plaintiff’s insurance company, review Plaintiff’s claims, and discuss possible resolution. Thank you for your courtesy and consideration of this matter.

Respectfully submitted,

LaBONTE LAW GROUP, PLLC

BY: /s/ Scott H. Mandel

Scott H. Mandel, Esq.